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8 *Interim Class Counsel*

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

13  
14  
15 IN RE CALIFORNIA BAIL BOND  
ANTITRUST LITIGATION

16  
17 This Document Relates To:  
18 ALL ACTIONS

Master File No. 4:19-CV-000717-JST

CLASS ACTION

**DECLARATION OF JALLE DAFA IN  
SUPPORT OF PLAINTIFFS' REQUEST  
FOR JUDICIAL NOTICE IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS**

Judge: Hon. Jon S. Tigar  
Hearing Date: August 26, 2020  
Courtroom: 2, 4th Floor  
Time: 2:00 p.m.

1 I, Jallé Dafa, declare as follows:

2 I am an associate at the law firm of Lieff Cabraser Heimann & Bernstein, LLP (“Lieff  
3 Cabraser”), Interim Class Counsel in the above-titled action. I have personal knowledge of the  
4 facts herein and, if called upon to testify to those facts, I could and would do so competently.

5 1. Attached hereto as **Exhibit 1** is a printout of a web page entitled “How Bail  
6 Works” that contains a video entitled “Greg Padilla Bail Bonds Sacramento – FAQ.” In the  
7 video, Topo Padilla states that “[t]he premium of 10% is regulated by the California Department  
8 of Insurance. That rate cannot legally be discounted.” (quoting FAQ Video at 1:25, 1:49). It is  
9 available online at <https://www.padillabailbonds.com/how-bail-works-faq/> (last visited July 12,  
10 2020).

11 2. Attached hereto as **Exhibit 2** is a printout of an AIA web page entitled “About  
12 AIA” that details the history and extent of the nationwide network of AIA bail agents. It is  
13 available at: <https://www.aiaSurety.com/about/> (last visited July 12, 2020).

14 3. Attached hereto as **Exhibit 3** is a Form 990 prepared in 2005 by American Bail  
15 Coalition and filed with the Internal Revenue Service.

16 4. Attached hereto as **Exhibit 4** is a printout of Golden State Bail Agent’s  
17 Association’s (“GSBAA”) “Resources” web page. The web page states that Topo Padilla is the  
18 President of the GSBAA’s board. The GSBAA “Resources” web page is available at:  
19 <https://gsbaa.org/resources/> (last visited July 12, 2020).

20 5. Attached hereto as **Exhibit 5** is an excerpt from the rate review files of the  
21 California Department of Insurance with respect to a rate application filed by Defendant  
22 Continental Heritage Insurance Company in 1999. It is available at  
23 <https://interactive.web.insurance.ca.gov/warff/front?event=rateFilingPdf&function=warffRateFiling&filingNumber=99-13986> (last visited July 13, 2020).

25 6. Attached hereto as **Exhibit 6** is an excerpt from the rate review files of the  
26 California Department of Insurance with respect to a rate application filed by Defendant  
27 American Contractors Indemnity Company in 1999. It is available at  
28 <https://interactive.web.insurance.ca.gov/warff/front?event=rateFilingPdf&function=warffRateFiling>

1 [ng&filingNumber=99-4688](#) (last visited July 13, 2020).

2 7. Attached hereto as **Exhibit 7** is an excerpt from the rate review files of the  
3 California Department of Insurance with respect to a rate application filed by Defendant  
4 International Fidelity Insurance Company in 2017. It is available at  
5 <https://interactive.web.insurance.ca.gov/warff/front?event=rateFilingPdf&function=serffRateFiling>  
6 [g](#) (last visited July 13, 2020).

7 8. Attached hereto as **Exhibit 8** is an excerpt from Continental Heritage Insurance  
8 Company's 2014 Report entitled "Management's Discussion & Analysis of Financial Condition  
9 and Results of Operation" filed with the CDI, which was previously downloaded from the  
10 California Department of Insurance's website at  
11 <https://interactive.web.insurance.ca.gov/companyprofile/companyprofile?event=financialStatementEvent&doFunction=annualStatementsHome>, but which is no longer available online.

12 9. Attached hereto as **Exhibit 9** is the Report on Examination as to the Condition of  
13 the Allegheny Casualty Company as of December 31, 2015. Robert A. Pietras, Examiner-In-  
14 Charge and Certified Financial Reviewer from the New Jersey Department of Banking and  
15 Insurance ("NJDBI"), prepared the report. It is accessible on the NJDBI's website at  
16 [http://state.nj.us/dobi/division\\_insurance/solvency/finexam\\_rpt13285allegheny2015.pdf](http://state.nj.us/dobi/division_insurance/solvency/finexam_rpt13285allegheny2015.pdf) (last  
17 visited July 12, 2020).

18 \* \* \*

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20 I declare under penalty of perjury under the laws of the United States that the foregoing is  
21 true and correct.

22 Executed on the 13th of July, 2020, in Los Angeles, California.

23  
24 /s/ Jallé Dafa  
25 JALLÉ DAFA  
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/s/ Jallé Dafa  
Jallé Dafa  
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP